

SIGAL CHATTAH  
United States Attorney  
District of Nevada  
Nevada Bar No. 8264  
VIRGINIA T. TOMOVA  
Assistant United States Attorney  
Nevada Bar Number 12504  
501 Las Vegas Blvd. So., Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336  
[Virginia.Tomova@usdoj.gov](mailto:Virginia.Tomova@usdoj.gov)

*Attorneys for the Federal Defendant*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Jovan P. Blanton,

Plaintiff,

v.

Louis DeJoy,

Defendant.

Case No. 2:23-cv-02102-RFB-EJY

**Stipulation and Order to Extend Time  
to File a Response to Amended  
Complaint (ECF No. 27) and Withdraw  
Federal Defendant's Motion for  
Extension of Time (ECF No. 32)**

**(Third Request)**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure, Rule IA 6-1 of this Court's Local Rules, and the Court's Minute Order on June 12, 2025 (ECF No. 33), Plaintiff Jovan P. Blanton and Federal Defendant Louis DeJoy, through undersigned counsel, hereby stipulate and agree as follows:

Plaintiff filed his Amended Complaint on April 18, 2025. ECF No. 27.

The most recent deadline set for Federal Defendant to respond to Plaintiff's Amended Complaint was June 13, 2025. ECF No. 31.

Federal Defendant filed a motion to extend time to file a response to Plaintiff's Amended Complaint (ECF No. 27) on June 12, 2025. Counsel for Plaintiff was out of town and had technical difficulties which prevented him from responding to Federal Defendant's pre-motion extension requests on June 11 and 12.

On June 16, 2025, counsel for Plaintiff reached out to counsel for Federal Defendant and agreed to extend the time for Federal Defendant to respond to Plaintiff's Amended Complaint to **June 30, 2025**, in order to accommodate staffing shortages and the

1 relatedly substantial workload handled by counsel for Federal Defendant. The standard for  
 2 extending time is good cause. *See* FRCP 6(b)(1)(A).

3 Accordingly, the parties, through undersigned counsel, submit this stipulation for an  
 4 extension to **June 30, 2025**, for Federal Defendant to file a response to Plaintiff's Amended  
 5 Complaint.

6 Based on the discussion with Plaintiff's counsel on June 16, 2025, and the  
 7 stipulation reached between the parties, Federal Defendant respectfully withdraws the  
 8 Motion for Extension of Time to Answer (ECF No. 32), per the Court's order (ECF No.  
 9 33).

10 This is the third stipulated request for an extension of time to respond to Plaintiff's  
 11 Amended Complaint. This stipulated request is filed in good faith and not for the purposes  
 12 of undue delay.

13 Respectfully submitted this 17th day of June 2025.

14 LAW OFFICES OF MICHAEL P.  
 15 BALABAN

16 /s/ Michael P. Balaban  
 MICHAEL P. BALABAN  
 Nevada Bar No. 9370  
 10726 Del Rudini Street  
 Las Vegas, Nevada 89141

18 *Attorney for Plaintiff*

SIGAL CHATTAH  
 United States Attorney

16 /s/ Virginia T. Tomova  
 VIRGINIA T. TOMOVA  
 Assistant United States Attorney

*Attorneys for the Federal Defendant*

23 **IT IS SO ORDERED:**

24   
 25 UNITED STATES MAGISTRATE JUDGE

26 **DATED:** June 17, 2025